

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTHERN DISTRICT OF NEW YORK

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JANE DOE,

Plaintiff,

-against-

YESHIVA UNIVERSITY, ANDREW “AVI” LAUER,  
ESQ., CHAIM NISSEL, SEYFARTH SHAW, LLP,  
DOV KESSELMAN, ESQ., AND EMILY MILLER,  
ESQ.

Defendants.  
----- X

:  
: No. 1:22-CV-05405-PKC-KHP  
:  
:  
: **DECLARATION OF DANIELLE**  
: **C. LESSER IN SUPPORT OF**  
: **YESHIVA UNIVERSITY,**  
: **ANDREW “AVI” LAUER AND**  
: **CHAIM NISSEL’S RESPONSE**  
: **TO PLAINTIFF’S MOTION TO**  
: **PROCEED IN THIS ACTION**  
: **UNDER A PSEUDONYM**

DANIELLE C. LESSER declares under penalty of perjury pursuant to 28 U.S.C. § 1746  
as follows:

1. I am an attorney at law in the State of New York and a member of Morrison  
Cohen LLP, counsel for Defendants Yeshiva University, Andrew “Avi” Lauer, Esq., and Chaim  
Nissel (the “Yeshiva Defendants”). In my capacity as counsel for the Yeshiva Defendants, I am  
fully familiar with the facts of this matter. I respectfully submit this declaration in support of the  
Yeshiva Defendant’s Response to Plaintiff’s Motion for Leave to Proceed in This Action Under  
a Pseudonym.

2. Plaintiff is represented in this action by Kevin T. Mulhearn of Mulhearn Law.  
Mulhearn has a website accessible at the address <https://mulhearnlaw.com/>.

3. The home page of mulhearnlaw.com discusses some of Mulhearn’s cases,  
including this matter and an unrelated matter that involves the Yeshiva University High School  
for Boys in Manhattan. A true and correct copy of the home page of mulhearnlaw.com as of  
November 17, 2022 is attached hereto as **Exhibit 1**.

4. After filing the Amended Complaint, Plaintiff's counsel issued a press release dated June 27, 2022 that is available through his website. A true and correct copy of the press release is attached hereto as **Exhibit 2**.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 17, 2022  
New York, New York

/s/ Danielle C. Lesser  
Danielle C. Lesser  
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*Attorneys for Defendants  
Yeshiva University, Andrew "Avi" Lauer,  
and Chaim Nissel*